

The Honorable Robert J. Bryan

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

STATE OF WASHINGTON,

Plaintiff,

v.

THE GEO GROUP, INC.,

Defendant.

CIVIL ACTION NO. 3:17-cv-05806-RJB

DECLARATION OF LA ROND
BAKER IN SUPPORT OF
PLAINTIFF STATE OF
WASHINGTON'S MOTION FOR
SUMMARY JUDGEMENT ON
MINIMUM WAGE ACT CLAIM
AND DEFENDANT THE GEO
GROUP, INC.'S PREEMPTION
DEFENSE

Under penalty of perjury under the laws of the United States of America I, La Rond Baker, certify that the below is true and correct:

1. I am over the age of 18 and competent to testify in this matter.
2. I am an Assistant Attorney General in the Wing Luke Civil Rights Division of the Washington State Attorney General's Office and I represent the State of Washington in this matter.
3. Attached hereto as **Exhibit A** is a true and correct copy of The GEO Group, Inc.'s (GEO) Responses to Washington's First Requests for Admissions (RFAs) dated February 5, 2018.
4. Attached hereto as **Exhibit B** is a true and correct copy of the Northwest Detention Center (NWDC) 2014 Year End Report, used as Exhibit 36 in the deposition of Bertha Henderson, GEO-State 029834-59. Pursuant to the Protective Order, ECF 70, Exhibit B is filed under seal.

DECLARATION OF LA ROND BAKER IN
SUPPORT OF WASHINGTON'S MOTION
FOR SUMMARY JUDGEMENT ON
MINIMUM WAGE ACT CLAIM AND GEO'S
PREEMPTION DEFENSE

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ATTORNEY GENERAL OF WASHINGTON
Civil Rights Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744

5. Attached hereto as **Exhibit C** is a true and correct copy of the 2015 contract between Immigration and Customs Enforcement (ICE) and GEO, No. HSCEDM-15-D-00015, used as Exhibit 129 in the deposition of William McHatton, GEO-State 036825-7027. Pursuant to the Protective Order, ECF 70, Exhibit C is filed under seal.

6. Attached hereto as **Exhibit D** is a true and correct copy of the NWDC Facility History document, used as Exhibit 18 in the Federal Rule of Civil Procedure 30(b)(6) deposition of GEO, GEO-State 005744-48. Pursuant to the Protective Order, ECF 70, Exhibit D is filed under seal.

7. Attached hereto as **Exhibit E** is a true and correct copy of the NWDC Refusal to Work Form, used as Exhibit 103 in the deposition of Alisha Singleton, GEO-State 241573.

8. On February 1, 2019, Washington deposed William McHatton, a former GEO employee who worked for GEO from February 9, 2004 to August 28, 2018. McHatton Dep. 11:11-14. At the NWDC, McHatton served as compliance manager until 2010 when he was promoted to associate warden of security. McHatton Dep. 11:15-19. Attached hereto as **Exhibit F** is a true and correct copy of excerpts of the deposition transcript of William McHatton which have not been designated confidential by GEO.

9. On January 30, 2019, Washington deposed Bertha Henderson, an employee of GEO, who has worked at the NWDC since 2007 and has been Food Service Manager since June of that year. Henderson Dep. 19:1-19 (*See* Exhibit U). Attached hereto as **Exhibit G** is a true and correct copy of excerpts of the deposition transcript of Bertha Henderson that have been designated confidential by GEO. Pursuant to the Protective Order, ECF 70, these excerpts have been filed under seal.

10. Attached hereto as **Exhibit H** is a true and correct copy of the City of Tacoma Finance Department Certificate of Compliance, dated March 6, 2017, and used as Exhibit 11 in the Rule 30(b)(6) deposition of GEO.

11. Attached hereto as **Exhibit I** is a true and correct copy of the GEO's Policy and Procedure Manual, 5.1.2 Voluntary Work Program (VWP Policy), used as Exhibit 2 in the Rule 30(b)(6) deposition of GEO, GEO-State 003451-58.

12. On July 9, 2018, Washington took a Federal Rule of Civil Procedure 30(b)(6) deposition of GEO in the person of Ryan Kimble. Ryan Kimble has worked for GEO for approximately ten years and has worked at the NWDC for approximately five years. GEO 30(b)(6) Dep. 20:23-21:5 (*See* Exhibit BD). Currently, he works as the Associate Warden of Finance and Administration. GEO 30(b)(6) Dep. 21:6-12 (*See* Exhibit BD). Attached hereto as **Exhibit J** is a true and correct copy of the confidential excerpts of the transcript of the Rule 30(b)(6) deposition of GEO. Pursuant to the Protective Order, ECF 70, these excerpts have been filed under seal.

13. On January 31, 2019, Washington deposed Alisha Singleton, a GEO employee who started working at the NWDC in September of 2001 and has been working as a Classification Officer since approximately 2006. Singleton Dep. 10:17-18, 11:5-12:3. Attached hereto as **Exhibit K** is a true and correct copy of excerpts of the deposition transcript of Alisha Singleton.

14. Attached hereto as **Exhibit L** is a true and correct copy of a GEO memorandum entitled, "Fired Kitchen Detainees," dated June 22, 2005, used as Exhibit 109 in the deposition of Alisha Singleton, GEO-State 231194. The detainees' names and alien numbers listed in this document have been redacted and pursuant to the Protective Order, ECF 70, Exhibit L is filed under seal.

15. Attached hereto as **Exhibit M** is a true and correct copy of the GEO Policy and Procedure Manual, 3.3.1 Infractions and Disciplinary Sanctions, used as Exhibit 137 in the deposition of William McHatton, GEO-State 016389-407.

16. Attached hereto as **Exhibit N** is a true and correct copy of the Performance Based Detention Standards (PBNDS) 2011, Section 5.8 Voluntary Work Program, used as Exhibit 17 in the Rule 30(b)(6) deposition of GEO.

1 17. Attached hereto as **Exhibit O** is a true and correct copy of GEO's Responses and Objections
2 to Washington's Second Set of Requests for Admissions dated December 20, 2018.

3 18. Attached hereto as **Exhibit P** is a true and correct copy of a memorandum entitled
4 "Voluntary Work Program 2011 PBNDS Standards," dated April 12, 2012 and used as Exhibit 14
5 in the Rule 30(b)(6) deposition of GEO, GEO-State 003477. Pursuant to the Protective Order, ECF
6 70, Exhibit P is filed under seal.

7 19. Attached hereto as **Exhibit Q** is a true and correct copy of a 2014 email chain between ICE
8 and GEO regarding the Voluntary Work Program, GEO-State 283813. Pursuant to the Protective
9 Order, ECF 70, Exhibit Q is filed under seal.

10 20. Attached hereto as **Exhibit R** is a true and correct copy of the Department Head Meeting
11 Notes dated May 1, 2012 used as Exhibit 78 in the deposition of Alisha Singleton, GEO-State
12 029337-38. Pursuant to the Protective Order, ECF 70, Exhibit R is filed under seal.

13 21. Attached hereto as **Exhibit S** is a true and correct copy of the Voluntary Work Program
14 Agreement in both English and Spanish, GEO-State 015834-35.

15 22. On May 20, 2019, Washington deposed Bruce Scott, a GEO employee who has worked at
16 the NWDC since April 2010. Scott Dep. 9:15-18. Scott has worked as fire safety manager, chief of
17 security and has worked as the Assistant Warden of Security since August of 2018. Scott Dep.
18 164:9-19. Attached hereto as **Exhibit T** is a true and correct copy of excerpts of the deposition
19 transcript of Bruce Scott.

20 23. Attached hereto as **Exhibit U** is a true and correct copy of excerpts of the deposition
21 transcript of Bertha Henderson which have not been designated confidential by GEO.

22 24. Attached hereto as **Exhibit V** are true and correct copies of declarations of former GEO
23 employees including: John Patrick Griffin, WA00008077-82; Brian Strong, WA00022556-59; and
24 Sean McCreery, WA00011911-15, as well as current and former detainees including: Orlando
25 Zavalza Marquez, WA0006973-77; Manuel Riveron Pina, WA00007582-86; Jesus Lopez Paez,

1 WA0008066-72; Noe Baltazar Noe, WA00029703-07; Karla Gomez de Soto, WA00029711-14;
2 and Judith Chavez Ortiz, WA0008073-76.

3 25. Attached hereto as **Exhibit W** is a true and correct copy of excerpts of the transcript of the
4 deposition of Alisha Singleton designated confidential by GEO. Pursuant to the Protective Order,
5 ECF 70, these excerpts have been filed under seal.

6 26. Attached hereto as **Exhibit X** are true and correct copies of the Detainee Job Descriptions
7 used in the deposition of Alisha Singleton, including: Cook/Prep/Server, Exhibit 83, GEO-State
8 015099; Dishwasher/Pots & Pans, Exhibit 84, GEO-State 015100; Laundry Worker, Exhibit 85,
9 GEO-State 020107; Barber, Exhibit 88, GEO-State 019287; Barbershop Cleaner, Exhibit 89, GEO-
10 State 19288; Pod Porter, Exhibit 91, GEO-State 036481-82; Server Positions and Pod Worker
11 Positions, Exhibit 101, GEO-State 241568-69; and Medical Cleaning, GEO-State 022561. Pursuant
12 to the Protective Order, ECF 70, Exhibit X is filed under seal.

13 27. Attached hereto as **Exhibit Y** is a true and correct copy of a summary table of VWP
14 positions, number of detainee workers for each position, and hours worked which was used as
15 Exhibit 20 in the Rule 30(b)(6) deposition of GEO, GEO-State 019281. Pursuant to the Protective
16 Order, ECF 70, Exhibit Y is filed under seal.

17 28. On June 26, 2019, counsel for all parties were able to inspect the NWDC and take
18 photographs. Attached hereto as **Exhibit Z** are true and correct copies of photographs of the kitchen
19 in the NWDC, WA00029885, 29974, 30102, 29909, 29928, 29918, 30107, 29900, 29944, 29967,
20 30053, 30082, 29997. Pursuant to the Protective Order, ECF 70, Exhibit Z is filed under seal.

21 29. Attached hereto as **Exhibit AA** are true and correct copies of photographs of the laundry in
22 the NWDC, WA00030815, 30823, 30839, 30854, 30876, 30881. Pursuant to the Protective Order,
23 ECF 70, Exhibit AA is filed under seal.

30. Attached hereto as **Exhibit AB** are true and correct copies of photographs of the barbershop in the NWDC, WA00029833, 29842, 29844, 29822, 29814, 29828, 29837, 29781, 29783. Pursuant to the Protective Order, ECF 70, Exhibit AB is filed under seal.

31. Attached hereto as **Exhibit AC** are true and correct copies of photographs of the “Grey Mile” in the NWDC, WA00029761, 29769, 29879, 29881, 30519, and 31156. Pursuant to the Protective Order, ECF 70, Exhibit AC is filed under seal.

32. Attached hereto as **Exhibit AD** are true and correct copies of photographs of the law library in the NWDC, WA00029726, 29747. Pursuant to the Protective Order, ECF 70, Exhibit AD is filed under seal.

33. Attached hereto as **Exhibit AE** are true and correct copies of photographs of the recreation area in the NWDC, WA00030815, 30823, 30839, 30854, 30876, 30881, 30210, 30219. Pursuant to the Protective Order, ECF 70, Exhibit AE is filed under seal.

34. Attached hereto as **Exhibit AF** are true and correct copies of photographs of the intake in the NWDC, WA00031034, 31051. Pursuant to the Protective Order, ECF 70, Exhibit AF is filed under seal.

35. Attached hereto as **Exhibit AG** are true and correct copies of photographs of the medical area in the NWDC, WA00030992, 30996. Pursuant to the Protective Order, ECF 70, Exhibit AG is filed under seal.

36. Attached hereto as **Exhibit AH** are true and correct copies of photographs of the visitation area in the NWDC, WA00029857, 29869. Pursuant to the Protective Order, ECF 70, Exhibit AH is filed under seal.

37. Attached hereto as **Exhibit AI** are true and correct copies of photographs of the detainee living areas, WA00030655, 30418, 30425, 30419, 30414, 30496, 30451. Pursuant to the Protective Order, ECF 70, Exhibit AI is filed under seal.

38. On June 18, 2019, Washington deposed Leonardo Jaramillo a former GEO employee who worked at the NWDC from 2004 to July 2011 and August 2012 to March 2017 in the positions of segregation lieutenant, shift lieutenant, captain, and major/chief of security. Jaramillo Dep. 11:11-13:6; 29:7-9. Attached hereto as **Exhibit AJ** is a true and correct copy of excerpts of the deposition transcript of Leonardo Jaramillo.

39. Attached hereto as **Exhibit AK** is a true and correct copy of the GEO Corporate Policy Manual, 7.1.11 Personal Protective Equipment, used as Exhibit 136 in the deposition of William McHatton, GEO-State 000783-84. Pursuant to the Protective Order, ECF 70, Exhibit AK is filed under seal.

40. Attached hereto as **Exhibit AL** is a true and correct copy of photographs taken during the June 26, 2019 inspection which show materials and tools GEO provides to detainee workers, WA00031158, 31159, 30731, 31160, 31131. Pursuant to the Protective Order, ECF 70, Exhibit AL is filed under seal.

41. Attached hereto as **Exhibit AM** is a true and correct copy of the NWDC Post Orders for the Housing Unit Officer used as Exhibit 169 in the deposition of Bruce Scott, GEO-State 049435-65. Pursuant to the Protective Order, ECF 70, Exhibit AM is filed under seal.

42. Attached hereto as **Exhibit AN** is a true and correct copy of the Kitchen worker orientation checklist used as Exhibit 5 in the Rule 30(b)(6) deposition of GEO, GEO-State 003538-56. Pursuant to the Protective Order, ECF 70, Exhibit AM is filed under seal.

43. On May 22, 2019, Washington deposed Ryan Kimble in his individual capacity as Associate Warden of Finance and Administration for GEO at the NWDC. Attached hereto as **Exhibit AO** is a true and correct copy of excerpts of the deposition transcript of Ryan Kimble which have not been designated confidential by GEO.

44. Attached hereto as **Exhibit AP** is a true and correct copy of the Daily Worker Pay Sheet dated May 9, 2013 and used as Exhibit 57 in the deposition of Bertha Henderson, GEO-State

1 051384-87. Pursuant to the Protective Order, ECF 70, Exhibit AP is filed under seal. Detainee
2 names and alien numbers have been redacted.

3 45. Attached hereto as **Exhibit AQ** is a true and correct copy of the NWDC Policy and
4 Procedure Manual, 4.3.1 Food Service Operations used as Exhibit 27 in the deposition of Bertha
5 Henderson, GEO-State 009340-74. Pursuant to the Protective Order, ECF 70, Exhibit AQ is filed
6 under seal.

7 46. Attached hereto as **Exhibit AR** is a true and correct copy of the NWDC Policy and
8 Procedure Manual, 8.1.1-A Food Service Management used as Exhibit 28 in the deposition of
9 Bertha Henderson, GEO-State 009379-81.

10 47. Attached hereto as **Exhibit AS** is a true and correct copy of PBNDS 2011, Section 4.1 Food
11 Service used as Exhibit 29 in the deposition of Bertha Henderson.

12 48. Attached hereto as **Exhibit AT** is a true and correct copy of the Pierce County Health
13 Department Food Establishment Inspection Report for the NWDC, dated November 20, 2012. This
14 inspection report was part of Exhibit 10 in the Rule 30(b)(6) deposition of GEO, GEO-State
15 000577-82. Pursuant to the Protective Order, ECF 70, Exhibit AT is filed under seal.

16 49. Attached hereto as **Exhibit AU** is a true and correct copy of the NWDC Facility Variance
17 Report for Fiscal Year 2013 used as Exhibit 187 in the deposition of Ryan Kimble, GEO-State
18 033144. Pursuant to the Protective Order, ECF 70, Exhibit AU is filed under seal.

19 50. Attached hereto as **Exhibit AV** is a true and correct copy of photographs of detainees
20 working in the NWDC kitchen while being supervised by GEO employees. This photograph was
21 used as Exhibit 49 in the deposition of Bertha Henderson, GEO-State 048485-90. Pursuant to the
22 Protective Order, ECF 70, Exhibit AV is filed under seal.

23 51. Attached hereto as **Exhibit AW** is a true and correct copy of a May 31, 2013 email chain
24 between GEO employees regarding boots worn by detainee kitchen workers. This email chain was
25

1 used as Exhibit 55 in the deposition of Bertha Henderson, GEO-State 238991-92. Pursuant to the
 2 Protective Order, ECF 70, Exhibit AW is filed under seal.

3 52. Attached hereto as **Exhibit AX** is a true and correct copy of the NWDC Detainee kitchen
 4 worker hygiene and grooming standards used as Exhibit 4 in the Rule 30(b)(6) deposition of GEO,
 5 GEO-State 003519.

6 53. Attached hereto as **Exhibit AY** is a true and correct copy of the NWDC Policy and
 7 Procedure Manual, 4.4.5 Laundry Services, used as Exhibit 86 in the deposition of Alisha Singleton,
 8 GEO-State 048841-43.

9 54. Attached hereto as **Exhibit AZ** is a true and correct copy of the NWDC Post Orders for the
 10 Kitchen Officer Swing used as Exhibit 142 in the deposition of William McHatton, GEO-State
 11 016065-90. Pursuant to the Protective Order, ECF 70, Exhibit AZ is filed under seal.

12 55. Attached hereto as **Exhibit BA** is a true and correct copy of a memorandum entitled
 13 “Laundry POA,” dated August 24, 2011 and used as Exhibit 146 in the deposition of William
 14 McHatton, GEO-State 020014. Pursuant to the Protective Order, ECF 70, Exhibit BA is filed under
 15 seal.

16 56. Attached hereto as **Exhibit BB** is a true and correct copy of excerpts of the transcript of the
 17 deposition of William McHatton which have been designated confidential by GEO. Pursuant to the
 18 Protective Order, ECF 70, these excerpts have been filed under seal.

19 57. Attached hereto as **Exhibit BC** is a true and correct copy of the NWDC Job Assignments
 20 table used as Exhibit 9 in the Rule 30(b)(6) deposition of GEO. Pursuant to the Protective Order,
 21 ECF 70, Exhibit BC is filed under seal.

22 58. Attached hereto as **Exhibit BD** is a true and correct copy of the non-confidential excerpts
 23 of the transcript of the Rule 30(b)(6) deposition of GEO.

59. Attached hereto as **Exhibit BE** is a true and correct copy of a memorandum entitled “D-1 Laundry” dated July 19, 2011, used as Exhibit 121 in the deposition of Bertha Henderson, GEO-State 036819-20. Pursuant to the Protective Order, ECF 70, Exhibit BE is filed under seal.

60. Attached hereto as **Exhibit BF** is a true and correct copy of the NWDC Detainee Laundry Training used as Exhibit 133 in the deposition of William McHatton, GEO-State 003525.

61. Attached hereto as **Exhibit BG** is a true and correct copy of the NWDC Housekeeping Plan, used as Exhibit 12 in the Rule 30(b)(6) deposition of GEO, GEO-State 000632-35.

62. Attached hereto as **Exhibit BH** is a true and correct copy of an email chain between GEO employees and the Department of Homeland Security regarding cleaning of medical spaces, used as Exhibit 161 in the deposition of Bruce Scott, GEO-State 000622-28.

63. Attached hereto as **Exhibit BI** is a true and correct copy of the Annual OSHA Barber Shop Inspection document used as Exhibit 135 in the deposition of William McHatton, GEO-State 037347. Pursuant to the Protective Order, ECF 70, Exhibit BI is filed under seal.

64. Attached hereto as **Exhibit BJ** is a true and correct copy of the NWDC Post Orders for the Barbershop used as Exhibit 139 in the deposition of William McHatton, GEO State 027416-38. Pursuant to the Protective Order, ECF 70, Exhibit BJ is filed under seal.

65. Attached hereto as **Exhibit BK** is a true and correct copy of the Kitchen Officer Swing, used as Exhibit 142 of the Deposition of William McHatton, GEO-State 016065-90. Pursuant to the Protective Order, ECF 70, Exhibit BK is filed under seal. Detainee names and alien numbers have been redacted.

66. Attached hereto as **Exhibit BL** is a true and correct copy of an email sent March 4, 2014 from Bill McHatton regarding the VWP used as Exhibit 16 in the Rule 30(b)(6) deposition of GEO, GEO-State 006269-70. Pursuant to the Protective Order, ECF 70, Exhibit BL is filed under seal.

67. Attached hereto as **Exhibit BM** is a true and correct copy of a memorandum entitled “2016 Spring Cleaning Project” dated March 1, 2016, used as Exhibit 148 in the deposition of William

1 McHatton, GEO-State 033147-48. Pursuant to the Protective Order, ECF 70, Exhibit BM is filed
2 under seal.

3 68. Attached hereto as **Exhibit BN** is a true and correct copy of Facility Jobs Available, dated
4 March 6, 2013, used as Exhibit 168 in the deposition of Bruce Scott, GEO-State 252347. Pursuant
5 to the Protective Order, ECF 70, Exhibit BN is filed under seal.

6 69. Attached hereto as **Exhibit BO** is a true and correct copy of excerpts of the deposition
7 transcript of Ryan Kimble which have been designated confidential by GEO. Pursuant to the
8 Protective Order, ECF 70, Exhibit BO is filed under seal.

9 70. Attached hereto as **Exhibit BP** is a true and correct copy of a memorandum entitled "Full-
10 time Workers Schedules," dated April 14, 2005 and used as Exhibit 96 in the deposition of Alisha
11 Singleton, GEO-State 048705. Pursuant to the Protective Order, ECF 70, Exhibit BP is filed under
12 seal.

13 71. Attached hereto as **Exhibit BQ** is a true and correct copy of the Internal Job Posting for
14 Food Service Supervisor, used as Exhibit 42 in the deposition of Bertha Henderson, GEO-State
15 019374-76. Pursuant to the Protective Order, ECF 70, Exhibit BQ is filed under seal.

16 72. Attached hereto as **Exhibit BR** is a true and correct copy of the NWDC Food Production
17 Supervisor Job Description, used as Exhibit 43 in the deposition of Bertha Henderson, GEO-State
18 021123-24. Pursuant to the Protective Order, ECF 70, Exhibit BR is filed under seal.

19 73. Attached hereto as **Exhibit BS** are true and correct copies of the NWDC Post Orders for
20 Housing Unit Officer, Exhibit 140, GEO-State 027439-69 and Laundry Officer, Exhibit 141, GEO-
21 State 028704-26. Pursuant to the Protective Order, ECF 70, Exhibit BS is filed under seal.

22 74. Attached hereto as **Exhibit BT** is a true and correct copy of a string of emails from
23 October 23, 2012 among GEO employees regarding kitchen clean up detail workers quitting. These
24 emails were used as Exhibit 38 in the deposition of Bertha Henderson, GEO-State 039161-62.
25 Pursuant to the Protective Order, ECF 70, Exhibit BT is filed under seal.

75. Attached hereto as **Exhibit BU** is a true and correct copy of an email sent August 25, 2014 from Leonardo Jaramillo to GEO employees regarding sack lunches. This email was used as Exhibit 39 in the deposition of Bertha Henderson, GEO-State 049433-34. Pursuant to the Protective Order, ECF 70, Exhibit BU is filed under seal.

76. Attached hereto as **Exhibit BV** is a true and correct copy of an email from former GEO employee and Food Service Supervisor, John Patrick Griffin to Bertha Henderson regarding providing detainee workers chicken thighs. This email was used as Exhibit 71 in the deposition of Bertha Henderson, GEO-State 241347. Pursuant to the Protective Order, ECF 70, Exhibit BV is filed under seal.

77. Attached hereto as **Exhibit BW** is a true and correct copy of the Batch Listing from December 7, 2009 used as Exhibit 115 in the deposition of Alisha Singleton, GEO-State 104147-70. Pursuant to the Protective Order, ECF 70, Exhibit BW is filed under seal.

78. Attached hereto as **Exhibit BX** is a true and correct copy of a Daily Work Crew Count Sheet used as Exhibit 6 in the Rule 30(b)(6) deposition of GEO.

79. Attached hereto as **Exhibit BZ** is a true and correct copy of a November 5, 2012 email chain between GEO employees regarding Pod Workers who deal with food used as Exhibit 93 in the deposition of Bertha Henderson, GEO-State 019324-25. Pursuant to the Protective Order, ECF 70, Exhibit BZ is filed under seal.

80. Attached hereto as **Exhibit CA** is a true and correct copy of a memorandum entitled "Work Detail," dated February 20, 2006 and used as Exhibit 97 in the deposition of Alisha Singleton, GEO-State 213595. Pursuant to the Protective Order, ECF 70, Exhibit CA is filed under seal.

81. Attached hereto as **Exhibit CB** is a true and correct copy of a list of detainees removed from the kitchen detail due to Institution Disciplinary Panel (IDP) sanctions used as Exhibit 105 in the deposition of Alisha Singleton, GEO-State 231181-82. Pursuant to the Protective Order, ECF 70, Exhibit CB is filed under seal.

82. Attached hereto as **Exhibit CC** is a true and correct copy of a Detainee Request form dated July 8, 2010 used as Exhibit 104 in the deposition of Alisha Singleton, GEO-State 103716. Pursuant to the Protective Order, ECF 70, Exhibit CC is filed under seal.

83. Attached hereto as **Exhibit CD** is a true and correct copy of a memorandum entitled "ACA File 5C-06," dated August 29, 2017 used as Exhibit 138 in the deposition of William McHatton, GEO-State 041371. Pursuant to the Protective Order, ECF 70, Exhibit CD is filed under seal.

84. Attached hereto as **Exhibit CE** is a true and correct copy of the Batch Summary dated January 2, 2017, used as Exhibit 175 in the deposition of Ryan Kimble, GEO-State 227051-91. Pursuant to the Protective Order, ECF 70, Exhibit CE is filed under seal. Detainee names and alien numbers have been redacted.

85. Attached hereto as **Exhibit CF** is a true and correct copy of Pod Porters work assignments for July 14, 2017 used as Exhibit 81 in the deposition of Alisha Singleton, GEO-State 230007-20. Detainee names and alien numbers have been redacted and pursuant to the Protective Order, ECF 70, Exhibit CF is filed under seal.

86. Attached hereto as **Exhibit CG** is a true and correct copy of the NWDC Outcount Sheet dated May 31, 2010, used as Exhibit 51 in the deposition of Bertha Henderson, GEO-State 109476. Pursuant to the Protective Order, ECF 70, Exhibit CG is filed under seal. Detainee names and alien numbers have been redacted.

87. Attached hereto as **Exhibit CH** is a true and correct copy of Batch Listings from December 21, 2009 and January 4, 2010 used as Exhibits 65 and 66 in the deposition of Bertha Henderson, GEO-State 104477-98, 104702-23. On the first page of the December 21, 2009 Batch Listing, a detainee is shown to have been paid five dollars. Similarly on page 7 of the January 4, 2010 Batch Listing, three detainee workers are paid five dollars. Pursuant to the Protective Order, ECF 70, Exhibit CH is filed under seal. Detainee names and alien numbers have been redacted.

1 88. Attached hereto as **Exhibit CI** is a true and correct copy of memorandums from Ryan
 2 Kimble regarding detainee worker pay used as Exhibits 176-178 in the deposition of Ryan Kimble,
 3 GEO-State 047699, 047681, 047694. Pursuant to the Protective Order, ECF 70, Exhibit CI is filed
 4 under seal.

5 89. Attached hereto as **Exhibit CJ** is a true and correct copy of the June 19, 2019 letter from
 6 Anne M. Rose, Associate Legal Advisor, ICE, to GEO's counsel regarding the testimony of ICE in
 7 this case.

8 90. Attached hereto as **Exhibit CK** is a true and correct copy of the August 1, 2018 letter Anne
 9 M. Rose to GEO's Counsel regarding the testimony of former ICE employee, Tracey Valerio.

10
 11 Executed this 2nd day of July 2019 in Seattle, Washington.

12
 13 s/ La Rond Baker

14 LA ROND BAKER, WSBA No. 43610
 15 Assistant Attorney General
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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the United States District Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

Dated this 2nd day of July 2019.

s/ Caitilin Hall
CAITILIN HALL
Legal Assistant